

UNITED STATES DISTRICT COURT

United States Courts  
Southern District of Texas  
FILED

SOUTHERN DISTRICT OF TEXAS

JUL 24 2014

HOUSTON DIVISION

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

§ CRIMINAL NO.:

v.

§

§

VICTOR ALLEN WOODS,  
JAMES BURRELL GIBSON,  
TREMARCUS RAYVON McADAMS,  
JEREMIE TRAMAIN WASHINGTON  
Defendants

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**H 14 - 313**

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about September 5, 2013, in the Houston Division of  
the Southern District of Texas,

VICTOR ALLEN WOODS,  
JAMES BURRELL GIBSON,  
TREMARCUS RAYVON McADAMS,  
and  
JEREMIE TRAMAIN WASHINGTON,

defendants herein, aiding and abetting each other, by force,  
violence and intimidation did take and attempt to take from the  
person or presence of another money, belonging to and in the  
care, custody, control, management, and possession of the Wells  
Fargo Bank, 9511 North Sam Houston Parkway East, Humble, Texas,  
a bank whose deposits were then insured by the Federal Deposit

Insurance Corporation, and in committing such offense, the defendants, did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is a firearm.

In violation of Title 18, United States Code, §§ 2113(a), (d), and 2.

COUNT TWO

On or about September 5, 2013, in the Houston Division of the Southern District of Texas,

VICTOR ALLEN WOODS,  
JAMES BURRELL GIBSON,  
TREMARCUS RAYVON McADAMS,  
and  
JEREMIE TRAMAIN WASHINGTON,

defendants herein, aiding and abetting each other, did knowingly carry, and brandish a firearm, namely, a Taurus 9mm model PT92AFS semi-automatic pistol, a Sig Sauer .22 caliber model Mosquito semi-automatic pistol, and a Smith & Wesson .357 caliber model 28-2 revolver, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being bank robbery.

In violation of Title 18, United States Code, § 924(c)(1)(A)(ii) and § 2.

Notice of Criminal Forfeiture

Pursuant to Title 18, United States Code, § 924(d)(1) and Title 28, United States Code, § 2461, the United States of America gives notice to the defendants,

VICTOR ALLEN WOODS,  
JAMES BURRELL GIBSON,  
TREMARCUS RAYVON McADAMS,  
and  
JEREMIE TRAMAIN WASHINGTON,

that, in the event of conviction of the offense charged in Count One, the United States of America shall forfeit all firearms and ammunition involved in or used in any violation of any criminal law of the United States, including, but not limited to, a violation of Title 18, United States Code, §§ 2113(a) and (d). The property subject to forfeiture includes, but is not limited to:

1. Taurus 9mm model PT92AFS semi-automatic pistol, serial number TZC90311, and a spare clip for that handgun containing an additional 11 rounds of 9mm Luger ammunition;
2. Smith & Wesson .357 caliber model 28-2 revolver, serial number N595418, and approximately 10 rounds .357/.38 caliber ammunition; and
3. Sig Sauer .22 caliber model Mosquito semi-automatic pistol, serial number F098466, and approximately 10 rounds of .22 caliber ammunition.

Pursuant to Title 18, United States Code, § 924(d)(1), and Title 28, United States Code, § 2461, the United States of America gives notice to the defendants,

VICTOR ALLEN WOODS,  
JAMES BURRELL GIBSON,  
TREMARCUS RAYVON McADAMS,  
and  
JEREMIE TRAMAIN WASHINGTON,

that, in the event of conviction of the offense charged in Count Two, the United States of America shall forfeit all firearms and ammunition involved in or used in a violation of Title 18, United States Code, § 924(c)(1)(A)(ii) including, but not limited to:

1. Taurus 9mm model PT92AFS semi-automatic pistol, serial number TZC90311, and a spare clip for that handgun containing an additional 11 rounds of 9mm Luger ammunition;
2. Smith & Wesson .357 caliber model 28-2 revolver, serial number N595418, and approximately 10 rounds .357/.38 caliber ammunition; and
3. Sig Sauer .22 caliber model Mosquito semi-automatic pistol, serial number F098466, and approximately 10 rounds of .22 caliber ammunition.

Substitute Property

If any of the property described above, as a result of any act or omission of any of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

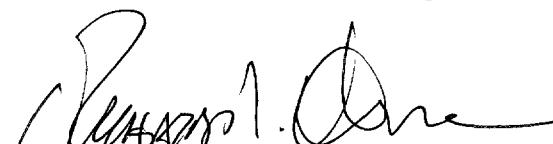
A TRUE BILL:

Original signature on File

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FOREMAN OF THE GRAND JURY

KENNETH MAGIDSON  
United States Attorney

BY:

  
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RICHARD D. HANES  
Assistant United States Attorney